District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 5E 107 P Street NW Washington, DC 20001

RE: Advisory Neighborhood Commission 5E Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Thomas, Cheolas, Williams, Segmen, Pinkney, Lewis, Holliday, Brannum, Barnes, and Jones:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community and reaffirmed policies not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 5E, marked as "Yes" were integrated into the Mayor's Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as "Support. No integration needed".

During OP's review, numerous recommendations received from ANC 5E were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as "Acknowledged" in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.



Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as "No" in the public review digest, and more appropriate programs or agencies have been identified.

The Commission's resolution included: changes to the Future Land Use Map along North Capitol; improving traffic circulation and connectivity throughout the Mid-City Area Element; and reinstating the Planning and Development Priorities Section. The Mayor's Proposal includes updates based on the Commission's recommended.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment. Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District's growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document's scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District's physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15, 2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two

training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 5E-1	2.13	815.8	Parks-Rec- Open Space	Amend text: Develop multi-use trails in underutilized rights of way, including surplus railroad corridors and undeveloped street rights of way, and possibly alleys.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5E-2	2.13		001 - General Comp Plan Comments	Opposed to redlining of the PLANNING AND DEVELOPMENT PRIORITIES - The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.	01-Yes	The Planning and Development Priorities section is being reinstated in the Area Elements.
ANC 5E-3	2.13		001 - General Comp Plan Comments	Opposed to redlining of the PLANNING AND DEVELOPMENT PRIORITIES - The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.	01-Yes	The Planning and Development Priorities section is being reinstated in the Area Elements.
ANC 5E-4	2.13		FLUM	LOCATION: Square 3102 along North Capitol St. NW Proposed for upzoning; Any major change to the height and density of the church and the two story row houses at 1714 -1722 North Capitol St. NW would have an extremely disruptive impact in general, and on that square in particular. The row is landlocked and proposed zoning upgrade will alter the quality of life for property owners who live there.	01-Yes	The FLUM reflects this proposal.
ANC 5E-5	2.13	2003.1	Mid City	Unclear why the percentage of population is the same in 2000 and 2017 (14%)	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5E-6	2.13	MC-2.7.3	Mid City	Amend to read: Policy: MC-2.7.3: Connecting Bloomingdale and Eckington Improve connectivity between Bloomingdale and Eckington by expanding the North Capitol overpass, decking over the entire expanse to create a tunnel between Seaton Place and Rhode Island Avenue and creating a green space to make crossing North Capitol Street more inviting for pedestrians and other persons using non-motor vehicles.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5E-7	2.13	MC-1.1.8	Mid City	Amend to read: Improve traffic circulation along major Mid-city arterial streets, with a priority on 14th St., Georgia Avenue, U. Street, 18th St., Columbia Road, Connecticut Avenue, North Capitol Street, New York Avenue NW, and Florida Ave NW. Whenever possible, prior to the initiation of any proposed 'dense' development in these areas, develop detailed plans of programs to improve bus circulation, pedestrian & cyclist safety and ease of travel, and programs to mitigate the effects of increased traffic on nearby residential streets.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5E-8	2.13	818.7	Parks-Rec- Open Space	Consider the development of 'podium' type open spaces and parks in the air rights over below-grade freeways and urban federal highways, including the I-395 Freeway through Downtown DC, and the Southeast-Southwest Freeway near Capitol Hill, and the underpasses of North Capitol Street.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5E-9	2.13		001 - General Comp Plan Comments	Support the principles outlined in Draft Framework Element 220.5, superficially acknowledging the crisis of affordable housing and emphasizing (1) the preservation of existing affordable housing and (2) the production of new affordable housing in Ward 5. We further support, acknowledge, and emphasize the need for affordable renter-and owner-occupied housing production and the use of tools such as public housing, community land trusts, and limited equity cooperatives.	02-Support. No integration needed.	Thank you for your support.

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ANC 5E-10		Namber	001 - General Comp Plan Comments	Support the changes in how D.C.'s "established" neighborhoods should be "supported" instead of "protected."	02-Support. No integration needed.	Thank you for your support.
ANC 5E-11	2.13		Arts and Culture	Support implementation of the themes outlined in the Draft Arts and Culture Element and the incorporation of the DC Cultural Plan (see, e.g., 1400.4). We also emphasize the following principles to guide implementation of both the Arts and Culture Element and DC Cultural Plan: o Support artist driven (rather than developer-driven) cultural spaces to provide jobs and space for artists and activate streets and neighborhoods. o Specifically recognize and support the work and investment of professional and full-time artists. o Extend the Draft Comp Plan's recognition and emphasis on avoiding displacement to consider the pervasive effects of displacement on DC's arts community, specifically the displacement of black artists. o Engage the arts community and artists directly when implementing the themes, actions, and policies outlined in the Arts and Culture Element and the Cultural Plan (for example, the loan programs outlined in the Cultural Plan are not well understood).	02-Support. No integration needed.	Thank you for your support.
ANC 5E-12	2.13		Economic Development	Support the principles outlined in Draft Economic Development Element 700.3 regarding economic development, economic opportunities for all residents, and equitable economic growth.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-13	2.13		Environmental Protection	Support efforts to restore DC's tree canopy and expand green infrastructure (see, e.g., 600.2, Policy E-1.1.2), particularly near the "heat islands" within Ward 5.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-14	2.13		Housing	Support more affordable and more dense housing in wealthy parts of the city, specifically Rock Creek West, Near Northwest, and Capitol Hill.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-15	2.13		Housing	Support proposed new action H-1.2.l: Leveraging Inclusionary Zoning.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-16	2.13		Land Use	The baseline density for the city should be moderate-density mixed-use; areas close to transit should be high-density mixed-use.		Thank you for your support.
ANC 5E-17	2.13	317		Comment: All of the Land Use language related to Group Housing for Special Needs Populations has been deleted. Such housing, of which there are many in ANC 5E, are licensed facilities, often requiring zoning variances or adjustments, and typically operated by private entities contracted by the City, and inequitably distributed throughout the City. When such facilities are well-operated, they can be benefits to both the neighborhood and facility residents. But when they are poorly operated, they can be the source of concern for the neighborhood with unmedicated, self-medicated, unsupervised facility residents engaging in atypical and sometimes bizarre public behavior. It is strongly recommended that the Comp Plan include language related to zoning, licensing, contracting, operation, and supervision of such facilities, and their expected contributions to strong inclusive neighborhoods.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-18	2.13		Mid City	Support previously approved and submitted Eckington Comp Plan amendments to include approved and rejected amendments.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-19	2.13		Parks-Rec- Open Space	Acknowledge and support the important role parks play in recreation, aesthetics, health and wellness, neighborhood character, and environmental quality, and resilience.	02-Support. No integration needed.	Thank you for your support.
ANC 5E-20	2.13	623.7	Environmental Protection	Restore the opening phrase: "Restrict development within FEMA designated flood plain areas" and restore similar language in Section 624.7, Policy E-4.7.4 on Floodplains	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Section: E-1.1 Preparing for and Responding to Natural Hazards details efforts to mitigate impacts from flooding and addresses resilient responses to flooding.

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ANC 5E-21			FLUM	Take a more general, less granular approach to amending the FLUM, with an eye toward converting and upzoning areas near commercial corridors and public transit to higher density, mixed uses. For example 2801 8th St. NE is designated Residential-Moderate Density/ Commercial-Low Density, while 2800 8th St. NE – directly across the street – is designated Production, Distribution, and Repair. Both of these properties will soon sit between two major, higher-density, mixed-use developments, and they are equidistant between two nearby metro stations.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Future Land Use Map and Generalized Policy Map are intended to provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies.
ANC 5E-22	2.13	2108	FLUM	Location: - Between Hawaii Ave. North Capitol St. NE, and Rock Creek Church Rd. NW Currently zoned: "Parks and Public Space". Recommended for "Moderate Density Zoning". It should be noted this proposed zoning change shall be contingent on completion of: a) comprehensive North-South traffic study of North Capitol St., and b) definitive determination of whether construction will or will not proceed at the McMillan Sand Filtration and Armed Services Retirement Home sites.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Recommended amendment reflects current land use condition.
ANC 5E-23	2.13	9934	FLUM	Location: N St. NW, North Capitol St. NW, O St. NW, and Q St. NW. Currently zoned "Low Density Residential". Recommended for "Moderate Density Commercial" (FAR 2.5 – 4.0: consistent with MU-5 – MU-7 zoning), and "Medium Density Residential" (FAR 1.8 -4.0: mid-rise apartment buildings and tall residential buildings surrounded by large areas of open space) The proposed residential area has a large number of residential homes, consistent with the neighborhood's residential character. Consequently, any existing housing should be maintained, protected, and supported. Commercial, Residential, and Mixed-Use zoning should be no more than "Moderate Density", with 'Medium' Density requiring award of a zoning variance or PUD application or other mechanisms associated with the granting of increased density over zoning limitations, and related resident comment.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Future Land Use Map and Generalized Policy Map are intended to provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies. Consistency with existing neighborhood character will be addressed through future development plans.
ANC 5E-24	2.13	9941	FLUM	LOCATION: Western side of North Capitol St between Quincy Pl. NW and Florida Ave. NW Currently zoned 'Low Density Commercial' and "Moderate Density Residential'. Recommended for: 'Moderate Density Commercial' and 'Medium Density Residential" In consideration of Historic District Designation, residential zoning should be limited to Moderate Density, with Medium Density requiring a zoning variance or PUD application or other mechanisms associated with the granting of increased density over zoning limitations, and related resident comment.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Future Land Use Map and Generalized Policy Map are intended to provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies. Consistency with existing neighborhood character will be addressed through future development plans.
ANC 5E-25	2.13		Housing	Incorporate more language from HUD's Affirmatively Furthering Fair Housing rule.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a high-level guiding document. The AFFH is a legal requirement that federal agencies and federal grantees have to follow.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into	OP Response
ANC 5E-26	2.13		Housing	Acknowledge the destructive history of restrictive covenants and housing discrimination in D.C.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; An equity crosswalk has been compiled which highlights policies and actions that address racial equity. The Framework Element also recognizes the impacts of structural racism under Section 213 Planning for Resilience and Equity.
ANC 5E-27	2.13	H-2.1.8	Housing	Amend text: As affordable housing reaches the end of its functional life, support the redevelopment of the site to the greatest extent feasible in line with the District's goals and strategies regarding equity and inclusion. Redevelopment strategies should also always include consideration of the cost-effectiveness of major renovation of existing affordable housing and other buildings, including the addition of stories (i.e. increased density and height).	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; See Housing Element for policies and actions regarding preservation of affordable housing. Redevelopment does not preclude major renovations.
ANC 5E-28	2.13	511.2	Housing	Amend text: An important part of ownership is access to financing and real estate opportunity. In the past, the practice of "redilining" (e.g., withholding home loan funds in certain neighborhoods due to their social/ethnic/racial composition) made it more difficult to secure home loans in parts of the city. Enforcement of Fair Housing practices is important not only to stop unfair lending practices, but also to address affordable housing opportunities in high cost areas, discrimination against renters, single parents, persons with AIDS, and others with special needs. In this regard, consistent with 513 H-3.2 Housing Access, the District should examine and clarify its policies and official actions that allow developers to construct a single building that functions as two buildings – one for market-rate units (predominantly white) and one for affordable senior housing units (in DC, typically predominantly black) – thereby promoting segregated housing in Washington, DC. For example, City officials should (in collaboration with HUD and fair housing officials), develop principles that do not allow, or at a very minimum, mitigate, the significant negative social-cultural, cultural displacement, marginality, and non inclusive impacts of separated senior housing (with separate entrances, lobbies, HVAC and other systems, and no access between the two building sections, etc.) in predominantly market rate residential buildings. Thus, public investment in housing should be a tool to remedy rather than promote segregation and inequality.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a high-level guiding document. HUD's Affirmatively Furthering Fair Housing Act AFFH is a legal requirement that federal agencies and federal grantees have to follow. Enforcement of comp plan policies is part of implementation and involves multiple District agencies.
ANC 5E-29	2.13	504.14	Housing	Language in this section is very ambiguous. Please either DELETE, or CLARIFY and PROVIDE SPECIFICITY related to the following: •density bonuses for affordable housing units that are above and beyond any underlying requirement. [what are these underlying requirements?] •flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood. [What are 'development standards' & provide examples; how is such 'flexibility' related to 'contributing features and neighborhood character'?]	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The policy references Planned Unit Developments which is a zoning regulation. Underlying requirements and standards are based on the underlying zoning for the development site.
ANC 5E-30	2.13	H-1.2.I	Housing	Amend text: Consistent with the goals that one-third of all new housing be reserved for households at 30% - 80% AMI, Inclusionary Zoning affordable housing requirements should be increased to 15%- 20%, the banning of IZ in the downtown area should be revoked, and PUDs and other mechanisms associated with the granting of increased density over zoning limitations should require 25% to 30% affordable housing units.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Land Use Element includes further policies and actions regarding IZ and PUDs. See Action LU-1.3.C: Metro Station and Inclusionary Zoning. OP along with DCHD are currently exploring the expansion of Inclusionary Zoning as part of the Mayor's goal to build 36,000 new homes by 2025. See the Housing Framework for Equity and Growth for more information.

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ANC 5E-31		504.16	Housing	Amend text: Whereas , during the period of 2006 – 2017, the number of affordable units for persons at 60% or less AMI decreased from 82,400 to 69,000 units and consistent with its May 5, 2018 Resolution No. 2018-33 titled 'The DC Comprehensive Plan and Affordable Housing in the District of Columbia' , ANC 5E strongly supports affordable housing targets as noted in Figure 5.23: 40% for households below 30% AMI, 30% for household at 30% - 60% AMI, and 30% for households at 60% - 80% AMI. We also reiterate the need for no less than 25% - 30% of all affordable housing be reserved for families requiring 3 to 4 bedrooms.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Housing Element prioritizes housing affordability across all income levels and household sizes. Figure 5.3, H-2.1.B, H-4.2.3 target extremely low income households while H-1.3.1 ensures larger family size affordable units are supported.
ANC 5E-32	2.13	1311.1	Infrastructure	At the end of the last new paragraph add: "In planning and implementing the new technologies [e.g. 5G cell], the District should minimize any adverse impacts on human health, streetscapes, and the environment."	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; There are separate policies and guidelines being developed through the Public Space Committee related to the placement of 5G infrastructure.
ANC 5E-33	2.13	303	Land Use	Add new text in section 303 prior to the policies and actions: Supporting growth and assessing its sustainability and limits. The history of DC and other American cities demonstrate that a high rate of growth is not continuously sustainable. In the case of Washington, DC, current growth is associated with decreasing financing interest rates and unique demographic patterns. More than 200,000 black residents have left or been forced out of the City. Most of the City's recent newcomers are overwhelmingly white, young adults (25 – 40 years of age), and more often than not, unmarried and/or without children. As this cohort ages, lifestyle changes are to be expected. In addition, supporting the current lifestyle of newcomers requires significant investments (e.g., multimodal transportation, entertainment and 'play' venues, infrastructure, utilities enhancements, etc.) As these persons age, it is probable they will seek larger family-style housing and less intense social and residential environments. External factors such as changing economic and financing environments will also impact their lifestyle and City resources. The current rate of growth has resulted in increasing inequality and the need for District government to increase its investment in services and housing for its less advantaged residents. Consequently, there is a need to continually assess not only the means for supporting growth, but also the sustainability and limits of growth. For the latter, the objective is to avoid unsustainable growth and City revenue deficits. The past two years have been marked by a progressive decrease in the number of newcomers to our City. There is a need to establish a matrix of indicators of the sustainability of growth (such as number and status of child and elderly populations, quality of life, affordability, infrastructure needs and costs –new & in need of repair/replacement, population needs, roadway use & capacity, environmental impacts, quality of public education, changes in social/economic inequality, commercial	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately addresses the need to evaluate and plan for changes in growth rates and trends in the District.
ANC 5E-34	2.13	309.6	Land Use	Amend text: Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down, buffet & carryout restaurants reflecting varying price points. In inclusive neighborhoods, shops & services collectively intentionally acknowledge the diversity of residents by reflecting their varying needs, cultural preferences, and economic means. Zoning and planning decision-makers should reflect this principle of diversity/inclusion in ALL of their deliberations and decisions.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The currently language provides examples, but does not represent an all inclusive list. Many other services are related to and reflected in day-to-day needs.

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ANC 5E-35		309.4	Land Use	Amend Text: During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities increased stability in its transitional, emerging, and distressed neighborhoods. In regard to affordable housing, greater emphasis should initially be placed on creating such housing units in those neighborhoods currently having lowest population density and/or lowest number/percentage of affordable units (see Table 5.6 of Comp Plan). This does not mean that all neighborhoods should become the same	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Housing Framework for Equity and Growth as well as the Housing Element provides guidance on where and how affordable housing should be achieved in the District.
ANC 5E-36	2.13	309.19a	Land Use	Amend Text: Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high quality developments with active ground floor designs that provide for neighborhood diverse commercial uses, vibrant pedestrian spaces and public benefits including housing, affordable housing, and affordable commercial space, with exceptional attention given to multi-modal transportation, traffic and parking impacts.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Transportation access issues for PUD's are addressed through DDOT's Consolidated Transportation Review Guidelines, with a focus on multimodal access.
ANC 5E-37	2.13	305.13	Land Use	Two principles should be applied to waterfront sites—maximum access for all citizens to waterfront amenities and conservation of natural resources. Residential, commercial, and office use often prevent such access for all citizens and should be prohibited.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Please see the Environmental Element for information on how to guide waterfront development, as well as the Area Elements with waterfront access.
ANC 5E-38	2.13		Mid City	Add the following text: The Mid-City Area Element includes the neighborhoods of Mount Pleasant, Lanier Heights, Adams Morgan, Columbia Heights, Shaw, Park View, Pleasant Plains, LeDroit Park, Bloomingdale, and Eckington. In 2014, the final Council-approved version of the Mid- City East Small Area Plan (MCESAP) was released. This plan was developed in response to the activism of residents and civic associations – which, along with the ANC, were highly engaged and involved in MCESAP's development (see p. 4 of MCESAP). This Plan focused on the neighborhoods of Bates/Truxton Circle and Hanover (both in the Near Northwest Area Element), Sursum Corda (in the Central Washington Area Element), sections of Edgewood and Stronghold (both in the Upper Northeast Area Element), and Bloomingdale, Eckington, and LeDroit Park (all in the Mid-City Area Element). According to the MCESAP, these neighborhoods reflect a "political amalgam", the boundaries of which "were designed to encompass those neighborhoods situated around a contiguous portion of North Capitol Street that had yet to have an approved small area plan to guide land use and development, filling an important gap in planning for this part of the District of Columbia. Sursum Corda, while already addressed in the Northwest One Plan, was also included to address that community's intent to redevelop their property while retaining affordability." The MCESAP authors conclude, "The many voices of Mid-City East community emerged to define a cohesive vision for the area: improve quality of life and enhance neighborhood amenities and character while supporting a community of culturally, economically and generationally diverse residents". However, the reality that the MCESAP encompasses neighborhoods in four Area Elements might possibly result in inconsistencies/conflicts between MCESAP recommended policies and actions and those of the relevant Area Elements. Consequently, in consideration of exceptional civic engagement/involvement of residents, civic associations, and ANCs	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language appropriately references the Mid City East Small Area Plan and does not need modification.

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ANC 5E-39	2.13	MC-1.1.4	Mid City	Amend to read: Protect the small businesses and essential local services that serve Mid-City. Encourage the establishment of new businesses that provide these services in areas where they are lacking, especially on the east side of the Planning Area by establishing small businesses in demographically changing neighborhoods that are predominantly residential in character. This program would serve to incentivize and stabilize small businesses in residential neighborhoods by providing technical assistance with business operations, assistance with increases in rent or property tax, and incentives to engage in cooperative activities (e.g., joint purchasing of equipment, supplies and inventories; trash disposal and other contracts with neighboring businesses), and collaborative efforts(with neighborhood residents and organizations. There is an additional need to recognize through DCRA and ABRA regulations, the unique storage, garbage disposal, and traffic/parking challenges of small businesses (especially small restaurants with limited space) operating in rowhouse neighborhoods. Improve traffic circulation along major Mid-city arterial streets, with a priority on 14th St., Georgia Avenue, U. Street, 18th St., Columbia Road, Connecticut Avenue, Florida Avenue, and North Capitol Street. Whenever possible, prior to the initiation of any proposed 'dense' development in these areas, develop detailed plans of programs to improve bus circulation, pedestrian & cyclist safety and ease of travel, and programs to mitigate the effects of increased traffic on nearby residential streets. Tax incentives might also be provided to nearby homeowners who improve their property through construction of a parking pad in their rear yards – thus improving safety on narrow neighborhood streets, and increasing the availability of on-street parking for those without rear yards and visitors. In consideration of the estimated additional 20,000 to 30,000 car trips per day associated with the development of the McMillan Sand Filtration site and th	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language is appropriate, incentivising private parking is not supported by policies in the Transportation Element. DDOT conducts transportation studies and analysis as appropriate, and the inclusion of a study for North Capitol is not necessary.
ANC 5E-40	2.13	MC-2.7	Mid City	Add the following text to the end of the Action: In consideration that nearly 45% of the recommendations of the approved Mid-City East Small Area Plan identify the 'community' as the responsible implementing or supporting party, the Office of Planning and other appropriate DC government Offices/Departments (e.g., DDOT) should be encouraged to develop a process for timely formal review and comment on planning and design reports prepared by voluntary neighborhood/civic/nonprofit groups to determine the reports' consistency with the Comprehensive Plan and approved Small Area Plans. If determined to be consistent and feasible, such Offices/Departments (including the Office of Public-Private Partnerships) shall seek to encourage potential public-private partnerships and other mechanisms that could provide technical and funding resources for implementation of the reports' recommendations.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Development processes already have opportunities for public involvement and comment.
ANC 5E-41	2.13	following 2017.5	Mid City	Add a new action following citation 2017.5 As a means of maintaining, improving, and preserving the unique character of Mid-City while fostering civic engagement, resident diversity, apprentice training, and subsequent employment of Mid-City residents (especially those who are unemployed, homeless, returnees from incarceration, and/or young adults), District government shall encourage the establishment of Public/Private Partnerships that would provide materials and labor for exterior façade painting of homes owned by Mid-City elderly lower & moderate income residents. Extend this high impact and low-cost model to other Planning Areas. Identify other needs of DC's special populations that might benefit from such an engagement/diversity/training/employment approach.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Please see the Housing Element for guidance on opportunities for home improvements.

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ANC 5E-42	2.13	2008.1	Mid City	Some Mid-City neighborhoods still struggle with violent crime, homelessness, drug abuse, vagrancy, and blight. Despite the real estate boom, buildings continue to lie vacant along commercial corridors such as lower Georgia Avenue, Florida Avenue, and North Capitol Street. The area also has a severe shortage of parkland. As the densest part of the city, and one with many young children, recreational needs are among the highest in the city. Most of the area's parks lack the land and amenities to meet these needs. **START ADD** Thoughtful redevelopment of the McMillan Sand Filtration Site can help meet the areas deficits of housing including its need for a grocery store, community center, recreational open space along with Senior Living plus a small percentage of new and affordable housing units to be developed by year 2025. **END ADD*	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language is appropriate and in line with the plan for McMillian.
ANC 5E-43		MC-1.2.5 / 2009.5	Mid City	Amend to read:	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; Please see the Urban Design Element for more guidance on medians, specifically Policy UD-3.3.2: Small Parks for Recreation and Transportation Element: Policy T-2.5.5: Natural Landscaping.
ANC 5E-44	2.13	MC-2	Mid City	Comment: Specifically include the unit-100 blocks of New York Ave. NW in the MC-2 Policy Focus Area. Given the residential nature of the street, coupled with the heavy traffic bound for 395, that this corridor should receive the same attention as North Capitol street in terms of streetscape rehabilitation and traffic safety, minus the commercial aspect.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The current policy focus areas are established and not changing, streetscape improvements can happen without its including in the policy area.
ANC 5E-45	2.13		Parks-Rec- Open Space	Integrate green space, new neighborhood parks, and the planting of additional trees in strategic areas to mitigate environmental concerns and to impact traffic flow.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The Environmental Protection Element discusses the importance of trees in mitigating negative impacts.
ANC 5E-46	2.13	2nd new paragraph following 807.3	Parks-Rec- Open Space	Amend text: The increase in the District's population means that there is a greater demand for commemorative parks under federal jurisdiction, such as Franklin Park, to serve a residential base Federal partnerships with local agencies and organizations, such as DPR, Business Improvement Districts (BIDs), and nonprofit groups are key to developing strategies that improve the character and function of these parks, provide new visitor amenities, and better support their neighborhoods while still protecting commemorative and historic resources within the parks. For example, planning for a deck-over park covering parts of the North Capitol Street underpass (spearheaded by the Bloomingdale Civic Association), involves this approach, i.e., a) seeking partnerships with a private architectural firm, the North Capitol Main Street, the Federal Highway Administration, abutting civic associations, and appropriate DC agencies; b) the proposed deck-over park having commemorative uses (e.g., timeline neighborhood history plagues of abutting neighborhoods embedded in the park walkways and a possible statute of a resident of historical significance) while providing other amenities for children, adults, and families (e.g. splash park/amphitheater, streetcar cafe, Capitol vista; play green space, etc.).	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The language is too specific to one particular area for the Parks, Recreation and Open Space Element, which is a citywide document.
ANC 5E-47	2.13	808.3	Parks-Rec- Open Space	At the end of this section, ADD the following: On the east side of the Mid-City Element area, the only recreation center is the Harry Thomas, Sr. Center, which due to recent renovations has excellent fields, swimming pool and other outdoor facilities. However, the Center's building is nearly unusable by the public. The Center needs to either be renovated and expanded, or razed with a new, larger, more functional facility built. In either case, landscaping should be greatly improved. (See Letter from ANC 5E to Mayor Bowser re: Request for Funding a New Harry Thomas Sr. Recreation Center, dated January 28, 2020). The need is to accommodate a variety of exercise and weight-lifting activities for varying ages, classrooms with computer facilities for health education and after-school and programs for seniors, community meeting rooms, and increased locker space.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; The language is too specific to one particular area for the Parks, Recreation and Open Space Element, which is a citywide document.

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ANC 5E-48	2.13	2408.2	Upper Northeast	At the end of the first paragraph, ADD Stronghold and Edgewood.	03- Acknowledged	Current language is sufficient and does not preclude regulatory action; List is not intended to be exhaustive.
ANC 5E-49	2.13		Arts and Culture	Commit to supporting more than just the three "centrally" located legacy arts districts mentioned in the draft Comp Plan Arts and Culture Element (the Downtown Arts District, the Uptown Arts District and the H Street NE Arts District).	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The District is transitioning to a cultural clusters model focused on equity building.
ANC 5E-50	2.13		Economic Development	Opportunity Zone areas have been identified throughout Ward 5 neighborhoods: the Rhode Island Avenue (NE) corridor, Brentwood, Edgewood and perhaps even blocks. There is an urgent need for increased specific procedures for civic engagement and input related to Opportunity Zones.	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Opportunity Zones are a federal program that by design does not afford community input. See ED-1.1.F Monitor Opportunity Zones.
ANC 5E-51	2.13	300.2	Land Use	Restore the first bullet: "Promoting neighborhood conservation". Neighborhoods are the underpinning of the city's success and their importance should be recognized and their character should be protected and enhanced.	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Conserving is the first works in the second bullet Concerving, creating and maintaining inclusive neighborhoods
ANC 5E-52	2.13	301.3	Land Use	Restore the phrase "it [the Land Use Element], should be given greater weight than the other elements". This is an important part of the balancing and the rest of the sentence doesn't make any sense without it.	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The currently language, which reflects the Land Use Element's role as integrating and balancing the other District policies is a more appropriate description of the element.
ANC 5E-53		304.2	Land Use	Restore the important wording of this section. Growth should be accommodated in a way that "protects" (current plan) not "respects" (new language) the area's historic character. The Plan for the City of Washington refers just to the L'Enfant Plan and does not include the McMillan Plan; both should be cited, as the current plan does. They should not be replaced by the more generic sounding, but more limited term—The Plan for the City of Washington—as the new language does. (see also Section 304.12) The Height Act is an important aspect of the core city and the reference to it should not be deleted. The "street and open space framework" reference has also been deleted and should be restored as an important part of the central city character.	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Consistency with existing neighborhood character will be addressed through future development plans.
ANC 5E-54	2.13	304.8	Land Use	Again, here and elsewhere where it appears, the change to "respecting" historic resources from "protecting" is an inappropriate watering-down of historic preservation responsibilities. Use "protecting"	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The change from "protecting" to "respecting" is not intended to lessen historic preservation responsibilities. See Historic Preservation Element.

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ANC 5E-55		314.12	Land Use	Eliminate "promote" and reinstate "ensure" compatibility. Surrounding areas should be able to expect that steps will be taken to ensure compatibility of industrial-type public works facilities. What would it even mean to "promote" such compatibility?	03- Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Ensure has been removed from the plan as it is a high-level guiding document and policy guidance of promote is more appropriate.
ANC 5E-56	2.13	1312.1	Infrastructure	Per pending litigation and decisions, after (FCC) in the first paragraph add: "They must also comply with all legal standards, such as environmental and historic preservation requirements." After the end of the last new paragraph add: "However, there are areas in the city where residents and businesses may believe that they are already adequately served with digital and information technologies. In order to be as responsive as possible to communities, individual ANCs should be afforded the opportunity to opt out of 5G implementation by resolution."	03- Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; There are separate policies and guidelines being developed through the Public Space Committee related to the placement of 5G infrastructure.
ANC 5E-57	2.13		Economic Development	Integrate human support and resource services (e.g., social services, police, gov't offices) as well as integral private retailers – such as grocery stores – into multi-use buildings proposed in the neighborhoods to address the basic needs of families and communities.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The composition of uses pertaining to mixed-use buildings are addressed by several elements including Urban Design, Community Services and Facilities, and Economic Development.
ANC 5E-58	2.13	503.9	Housing	Add the following text at the end of the paragraph: In the case of scattered small commercially-zoned pockets of land in predominantly residential neighborhoods, efforts should be made to ensure that any new mixed -use or residential development is not inconsistent in density or style with existing nearby homes or buildings – especially in Historic Districts.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See the Framework, Land Use, and Urban Design Elements for compatibility of density of new construction with existing structures.
ANC 5E-59	2.13	H-1.2.9	Housing	Comment: The current Comprehensive Plan is a 20-year document that expires in 2025. This policy includes affordable housing goals for 2050 (i.e., affordable housing should constitute 15% of housing in each Planning Area). All goals in this policy and throughout the proposed Comprehensive Plan amendments should be limited to 2025, and the stated affordable housing goals for each Area Element should be revised accordingly.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Comp Plan has a horizon of 2025 and sets a long-term vision for the District. Some forecasting and projections go to 2030 and 2045 in an effort to provide decision makers with well-rounded and robust information to aid in future implementation.
ANC 5E-60	2.13	504.14	Housing	This section laudably supports the effort to increase affordable housing. However, the character of neighborhoods is an important aspect of the livability of Washington, DC. Respecting the character of neighborhoods should always be required in allowing density bonuses and is particularly important in historic districts. Therefore, the following sentence that has been marked for deletion should be restored: "Density bonuses should be granted in historic districts only where the effect of such increased density does not significantly undermine the character of the neighborhood."	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Framework, Land Use,, Urban Design, and Historic Preservation Elements provide for density and neighborhood character language.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into	OP Response
ANC 5E-61	2.13		Implementatio n	Equity is intended to be a theme of this element. However, the element only mentions health and the environment. Jobs, transportation, education, and affordable housing are not mentioned. While there is an Equity Crosswalk Element, attention to equity needs to be significantly broadened in the Implementation Element narrative.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Equity is a major theme for the Comprehensive Plan. See the Equity Crosswalk, Framework Element, and all Citywide and Area Elements for equity specific narrative, policies, and actions.
ANC 5E-62	2.13	2016.9	Mid City	Keep sentence that was removed regarding viewsheds and vistas. See Texas Capitol View Corridors as a reference for view corridor planning.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Urban Design Element section UD-1.4 for more guidance on viewsheds.
ANC 5E-63	2.13	T-1.4.A	Transportation	Amend text: DDOT should encourage and actively promote opportunities for enhancement in ineffective and underused spaces citywide – especially in residential neighborhoods. Any enhancements within the public realm should prioritize safety and functionality of the space and carefully consider the impacts of the change to the space prior to any modifications being made. As a means of promoting the use of arts and streetscape in creating a sense of 'place', Developers of commercial/retail/non-residential space of more than 50,000 square feet or more, should be required to set-aside at least 1.0% of their total construction budget for the building's public art and beautification enhancements to be selected/designed in consultation with neighborhood residents. New construction of public buildings should also require such a set-aside.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Urban Design Element and the Arts and Culture Element speak to the importance of integrating public art in new developments.
ANC 5E-64	2.13	2408.16	Upper Northeast	At the end of the first paragraph ADD North Capitol Street.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; North Capitol Street is not in Upper NE Area Element. See Rock Creek East Area Element, Policy RCE-1.1.9: Traffic Management Strategies, and Action RCE-1.1.D: Improving Traffic Flow.
ANC 5E-65	2.13		001 - General Comp Plan Comments	The proposed crosswalk implementation table appears somewhat uneven in the details of its implementation actions across various plan elements and issues of concern. The following recommendations seek to provide guidance for related improvements: • The Resilience Plan should include specific targets addressing community emergency preparedness outreach, planning, engagement and resilience in response to all natural and manmade disasters, and acts of domestic or foreign/international terrorism. • The Plan must incorporate goals, objectives and joint community-government emergency preparedness initiatives that protect, preserve, and strengthen the quality of life for all in the District of Columbia and the history and values (e.g., equity, inclusiveness, etc.) that undergird it. • The District of Columbia must develop and implement specific plans and actions that ensure information and outreach related to emergency security and preparedness are coordinated and granular – i.e., involve efforts that are conducted person-by person, block-by-block, community -by -community, business by business, community institution by institution, etc. • The importance of community emergency preparedness as an essential element of planning for growth.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Community Services and Facilities Element section CSF-6 Emergency Preparedness and Resilience.
ANC 5E-66	2.13		Housing	Add the following text in regards to affordable housing: Affordable housing in DC shall be "invisible and integrated": that is, below market units (a) should bear no evidence of such status exterior to the unit. and (b) should be distributed throughout the development. Separate lobbies for tenants or owners of the below market rate units should be disallowed.	03- Acknowledged	Recommendation is sufficiently covered in another element/policy/action`; H-1.1.5 Housing Quality addresses design standards. Language does not preclude regulatory action with regards to integrated common areas.

Resolution		Citation/Tracking	Element	ANC Comment		OP Response
Number	Received	Number			Comp Plan	
ANC 5E-67		2.3.6		Amend text: Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city's neighborhoods in a manner similar to that accorded small businesses. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these institutions' transportation, other parking needs, operations, viability, and expansion,	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The current guidance is appropriate encourages coordination, which does not preclude the identified parking and viability issues.
ANC 5E-68	2.13	506.15	Housing	At the end of this section, ADD: As an incentive to homeowners to accept housing vouchers for rental of basement and accessory apartments, etc. in those residential neighborhoods with high cost rent or rapidly increasing rental rates, provide vouchers that are at least 10% higher in value than the median rentals for a unit of similar size and condition in the targeted neighborhoods.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; District of Columbia Housing Authority administers the District's Housing Choice Voucher Program and the Local Rent Supplement Programs.
ANC 5E-69	2.13	2.2.4	Land Use	Amend text: Encourage the development of public-private partnerships for projects (especially those initiated by residents) that improve the visual quality of the District's neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements, and public realm enhancement and activation. Whenever feasible, link such efforts to apprenticeship training programs for residents (especially those who are unemployed, homeless, returnees from incarceration, and/or young adults), of affected neighborhoods.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The current policy does not limit the ability of the public to partner with the District. The Economic Development Element provides guidance on the DC Infrastructure Academy.
ANC 5E-70	2.13	2.2.5	Land Use	Amend Text: Fully enforce conditions of approval for new development, including design, building, and operating criteria. In the event, after approval, an applicant subsequently requests a significant change in design or use that previously had been reviewed and/or approved by an ANC, applicant will be required to return to that ANC to seek approval of proposed significant change in design, density, or use	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document and does not mandate procedures.
ANC 5E-71	2.13	2.2.6	Land Use	Amend text: Support efforts by local Advisory Neighborhood Commissions, citizen/civic associations, garden clubs, homeowner groups, and other organizations to initiate neighborhood improvement and beautification programs. Provide information, guidance, and technical assistance and when possible access to public-private partnerships and other public and private funding sources, to these groups as appropriate and feasible	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The current policy does not limit the ability of the public to partner with the District.
ANC 5E-72	2.13		Transportation	Eliminate parking-minimum requirements, minimum lot size requirements, or setback requirements.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; This comment is outside the purview of the Comprehensive Plan. Minimum lot and setback requirements are determined as part of zoning. Parking requirements are determined by DDOT.